



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 4  
ATLANTA FEDERAL CENTER  
100 ALABAMA STREET, S.W.  
ATLANTA, GEORGIA 30303-3104

SEP 19 1997

ACTION MEMORANDUM

SUBJECT: Request for a Removal Action Ceiling Increase and exemption from the \$2 Million Dollar and the Twelve Month Statutory Limit at the Stoller Chemical Company-Pelham Site, Pelham, Mitchell County, Georgia

FROM: John H. Hankinson, Jr.  
Regional Administrator  
U.S. EPA Region 4

THRU: Steve D. Luftig, Director  
Office of Emergency and Remedial Response

TO: Tim Fields, Jr., Acting  
Assistant Administrator  
Office of Solid Waste and Emergency Response

I. PURPOSE

The purpose of this Action Memorandum is to request and document a Ceiling Increase to continue the removal action at the Stoller Chemical Company Site-Pelham (hereafter known as the Site), located on 106 Mitchell Street in Pelham, Mitchell County, Georgia. The abandoned fertilizer manufacturing facility continues to pose an imminent and substantial endangerment to the public and the environment. The planned removal activity meets 40 CFR § 300.415(b)(2) criteria for removal actions and is eligible for an emergency exemption under requirements governed by CERCLA 104(c). The projected ceiling for removal activity on the Site will be increased from \$8,383,000 to \$10,781,200, an increase of \$1,943,200. This will include an increase in the amount utilized for the ERCS contractor by \$1,800,000 resulting in a total of \$9,000,000 allotted for the ERCS contractor. The requested ceiling increase is necessary to fund the installation of a cap on existing solidified material at the Site.

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## II. SITE CONDITIONS AND BACKGROUND

### A. Site Description

EPA ID #:ZM

Removal Category: Time Critical

The Stoller Chemical Company Site in Pelham is a former fertilizer and agricultural chemical manufacturer which utilized "bag-house dust" (RCRA Waste Code: K061) in its manufacturing process. The Site was discovered by reviewing documents found at a similar site owned/operated by the same company. The Site, along with four others owned and operated by the Stoller Chemical Company, was abandoned through bankruptcy procedures in March, 1992. All chemical inventory and raw materials located at the facility were abandoned at that time.

On July 13, 1992, a site investigation was performed by the Technical Assistance Team (TAT) under the direction of EPA Region 4 Emergency Response and Removal Branch (ERRB). During this site investigation, the presence of numerous leaking tanks, abandoned vessels, and open vats of hazardous waste were documented. The Site also contained two wastewater pre-treatment impoundments. Both unsecured impoundments contained a characteristic hazardous waste (Corrosive, <2 pH) and were actively releasing acidic process wastewater into the environment at the time of the assessment. Extremely low pH wastewater from these surface impoundments flowed into creeks west of the Site and through the adjacent neighborhood. Extremely low pH water in the creek was confirmed by the OSC up to one-quarter (1/4) mile downstream from the Site.

Conditions at the Site continue to meet the requirements for a removal action, as stipulated in 40 CFR § 300.415 of the National Contingency Plan (NCP). A removal action was deemed necessary by the OSC to abate the threats present and eliminate the sources of confirmed and/or potential contaminant migration. A \$50,000 Emergency Action Memorandum was approved on July 14, 1992 to respond to the Site and stabilize the on-going releases. On August 24, 1992, an Action Memorandum was approved to continue the response action.

The Twelve Month Exemption and Ceiling Increase were signed August 26, 1993 and October 23, 1993, respectively. The Exemption to the \$2 Million Statutory Limit was signed by the Regional Administrator on July 13, 1994. An additional Ceiling Increase was signed on September 9, 1995.

## B. Removal Actions to Date

On July 14, 1992, the OSC determined that conditions at the Site represented an imminent and substantial threat to public health or the environment. Emergency removal actions were initiated by the OSC to eliminate off-site migration of low pH process wastewater. Emergency removal activities were conducted to stabilize two surface impoundments to prevent the overflow of low pH wastewater into the adjoining neighborhood via the local creek system.

During the removal, a wastewater treatment system was subsequently erected to adjust the pH of the wastewater. Over 4,000,000 gallons of low pH wastewater has been treated and discharged to date.

In order to facilitate the lowering of the water table and prevent the flow of surface water into the surface impoundments, a drainage channel was installed at the Site. This channel re-directed water around the up gradient portion of the impoundment where it is discharged to the creek system. This drainage system was modified to allow continuous flow through the Site. The "French Drain" slowed the recharge of the impoundments and enabled the OSC to de-water the impoundments.

An extensive soil sampling survey was performed to completely identify the nature and extent of soil contamination. Soil analysis indicated that the 17 acres around the process area was contaminated with lead. Original estimates of 75,000 cubic yards of contaminated soil had to be increased to 95,000 cubic yards. This was due to the additional volume of sludge excavated from the surface impoundments.

The soil surrounding the old sulfuric acid plant was identified as a source of the acid leaching at the Site. Buried tanks and raw elemental sulfur were causing the pH to drop significantly. Standing pools of water in the area registered less than 2 pH. A dilapidated building had to be demolished so that the lead contaminated soil beneath and around it could be excavated. During the excavation of this area, the facility's old lead acid chambers were uncovered reaffirming the area as a source of the acid leaching. This material was excavated and stockpiled separately for treatment. All soil and debris were systematically excavated from this area and transported to temporary storage cells.

Representative samples were collected from all tanks, drums, and containers on-site for hazard categorization. Waste profiles were developed for all hazardous material and submitted to a RCRA approved disposal facility for acceptance and disposal. Sample analysis performed on the material was used as a basis for the

waste bulking scheme. Several waste bulking groups were formed to reduce the treatment and/or disposal cost. To the extent possible, all corrosive liquids were incorporated in the water treatment system for on-site neutralization. This was the safest and most economical way to address this material. On-site treatment was also performed on some air-reactive material.

The facility's main process building represented a special problem. The physical dimensions of the wooden structure were 1250'(l)x 150'(w)x 50'(h) tall. The deteriorated condition of the building would not allow for the safe operation of heavy equipment inside. Due to the nature of a portion of the building's covering (asbestos) and the hazardous waste inside the building, it could not simply be wrecked or demolished by explosives. Therefore, the building had to be picked apart to minimize dispersion of contaminants into the environment. A decision was made to forego addressing the building until the end of the removal activity. However, the corner of the building "caved" in making it unsafe to operate heavy equipment in the immediate area. Resources allocated for soil solidification were committed to the completion of the demolition. The asbestos portion of the building and its connecting tower were left intact. Debris remaining from the building were secured at the Site.

The contaminated sediment and sludge in the surface impoundment was dredged and stockpiled for subsequent treatment. The addition of kiln dust to the sludge aided in the further dewatering of the spoil before transport to the stockpile area. The EPA Environmental Response Team (ERT) performed a treatability study on the soil and sludge to ascertain the most feasible solidification matrix.

Seventeen acres of soil exhibited lead contamination levels above 500 mg/kg. Due to funding priorities, the removal was not able to solidify the entire contaminated soil volume present at the Site. The 75,000 cubic yards (95,000 cubic yards adjusted) includes the soil excavated from the sulfuric acid plant area and the closure of the surface impoundments.

This solidified material was placed over the remaining lead contaminated soil to serve as a barrier to the migration and direct exposure threats. Due to the extent of soil contamination and funding limitations, only the exhumed soil, K061, and the spoil from the surface impoundment closure were solidified. The Georgia Environmental Protection Division (EPD) agreed to complete the removal action by installing the proposed cap. After an evaluation of what resources it would take to complete the installation, and current budget constraints, the EPD determined that they would not be able to complete the project.



Based on this information the EPA has taken steps to evaluate what resources are necessary to complete the installation of the cap.

On August 15, 1997, a site inspection was conducted by the OSC to determine current site conditions in preparation for the installation of the cap by the EPA. During the site inspection, it was determined that the main office and several buildings on-site showed signs of vandalism and trespassing. Access to the property can be obtained from any point around the 250 acres. Some areas of the site are overgrown with grassy vegetation. Due to prolonged exposure to the elements and lack of erosion control mechanisms, deep erosion channels have formed in many areas of the Site. Due to continued exposure to the elements, the entire surface of the solidified waste shows signs of moderate to heavy erosion. Large surface areas of the solidified waste have turned to a powder consistency. This material can be carried off-site via surface runoff or windblown dust and particulate matter due to adverse weather conditions.

Several large pools of an unidentified material were observed at the north west corner of the vault. During storm conditions, this material has the potential to enter the creek system which runs adjacent to a local neighborhood and the Site. Serious consideration should be given to the environment where the solidified waste will be land-filled. The vaulted material will be covered by a clay or synthetic cap and subsequently covered with clean soil. The indigenous "clayey" soil will be used from uncontaminated areas of the Site to reduce Site cost.

The requested ceiling increase is necessary to fund the restoration, installation of a cap over the existing solidified material, and installation of associated facilities. The solidified material that has been placed in a vault configuration has been exposed to the elements for over two years. This action will abate the immediate threats present at the Site. The work necessary to mitigate the Site's hazards will be labor and equipment intensive.

### C. State and Local Authorities' Role

State and Local authorities have indicated they cannot undertake any response activity on this Site in the future due to the lack of available funding.

### III. THREATS TO PUBLIC HEALTH OR WELFARE OR THE ENVIRONMENT, AND STATUTORY AND REGULATORY AUTHORITIES

#### A. Threats to Public Health or Welfare

The Site poses numerous potential threats to the public health and welfare. Applicable threats as defined in Section 300.415 (b) (2) of the National Contingency Plan are described below.

The factors cited from the National Contingency Plan must be considered in determining the appropriateness of a removal action. Vertical migration of metallic compounds into the groundwater can occur after solubilization by the low pH conditions. There is a residential area within 300 feet of the Site. Unchecked, the vault material and the unidentified liquid will run through the neighborhood. The following sections are cited as the basis for the continued removal activity.

*Section 300.415 (b) (2) (iv): "High levels of hazardous substances or pollutants or contaminants in soils largely at the surface, that may migrate."*

Seventeen acres of soil exhibited lead contamination levels above 500 mg/kg. Due to funding priorities, the removal program was not able to solidify the entire 95,000 cubic yards of contaminated soil at the Site. The solidified soil, k061, and the spoil from the surface impoundment was placed over the remaining lead contaminated soil to serve as a barrier to the migration and direct exposure threats. Due to the constant exposure to the elements, the contaminated on-site soils that have been solidified and placed in a vault configuration can be carried off-site via surficial runoff or windblown dust and particulate matter. The highest levels of lead contaminant on site were 21,000 mg/kg. Due to the general dusty conditions and sparse vegetation at the Site, this solidified material can be easily displaced and migrate off-site. Any occupants or trespassers on the Site will be potentially exposed via direct contact. This exposure can be compounded by contaminated airborne dust and particulate matter.

A clean-up level of 500 mg/kg Total Lead has been established for the Site. Solidification of the entire 17 acres could not be funded through the existing allowance, therefore a clean-up was designed that would address the most severely impacted areas and use that treated material to "cap" the remaining soil contamination.

*"Actual or potential exposure to nearby human populations, animals, or the food chain from hazardous substances or pollutants or contaminants. " [Section 300.415 (b) (2) (I)]*

The Site continues to present an imminent and substantial endangerment to the public. The Site is inadequately fenced and provides no significant means for the prevention of unauthorized access. The unsecured material is conducive to erosion.

*"Actual or potential contamination of drinking water supplies or sensitive ecosystems. " [Section 300.415 (b) (2) (ii)]*

EPA Site Assessment Section conducted a survey of the groundwater monitoring wells. Groundwater contamination was not detected in a precursory survey conducted by ERRB. Past releases of concentrated sulfuric acid to the lead contaminated soil could solubilize the existing contamination and track the contaminants deeper into the water column. This will increase contaminant migration and potentially contaminate the groundwater. If the potential source of the groundwater contamination is not addressed, a release may possibly affect area drinking water sources. At this time, no residential drinking water sources (municipal or private) have been contaminated with substances associated with this Site.

*"Weather conditions that may cause hazardous substances or pollutants or contaminants to migrate or be released. " [Section 300.415 (b) (2) (v)]*

This area of Georgia is often subjected to violent thunderstorms. Any rainfall event will continue to contribute to the off-site migration problem if uncontrolled. If removal activity is not continued, the vaulted material will have to be secured against erosion.

*"Availability of other appropriate federal or state response mechanisms to respond to a the release. " [Section 300.415(b) (2) (vii)]*

It is not expected that any State or Local entity will initiate and maintain any removal activity at this Site.

#### IV. ENDANGERMENT DETERMINATION

Actual or threatened releases of hazardous substances from this Site, if not addressed by implementing the response action selected in this Action Memorandum, will continue to present an imminent and substantial endangerment to public health and the environment.



## V. Exemption from Statutory Limits

A significant threat to the public health or welfare remains at the Stoller Chemical Site - Pelham. Section 300.415 (b)(2) of the National Contingency Plan (NCP) lists the factors to be considered in determining the appropriateness of a removal action. Continued response actions are required to mitigate the ongoing release and threats of release at the Site. These threats can be mitigated only by the completion of the removal action which has been initiated. Conditions at the Site fully meet the emergency criteria given under sections 104<sup>e</sup> of CERCLA, to exceed time and dollar limitations.

### A. Emergency Exemption

#### 1. Immediate Risk to Public Health or Welfare or the Environment

Conditions at the Site continue to present an immediate endangerment to the public and environment. Soil samples from the contaminated area, taken at depths up to seven feet, have identified lead concentrations as high as 21,000 mg/kg. Lead is poisonous by ingestion. It is a suspected carcinogen of the lungs and kidneys. Effects by ingestion and inhalation include loss of appetite, anemia, insomnia, headache, irritability, muscle and joint pains. Experimental evidence suggests that blood levels of lead below 10 ug/dl can have the effect of diminishing the IQ scores in children. Low levels of lead impair neurotransmission and immune system function and may increase systolic blood pressure. Severe toxicity can cause sterility, abortion and neonatal mortality and morbidity. Any occupants or trespassers on the Site will be exposed to dusty conditions caused by erosion of the solidified waste and soil with high concentrations of lead that has been exposed due to adverse weather conditions.

Due to the sparse vegetation on-site, this exposure can be compounded by contaminated airborne dust and particulate matter. Windborne contaminated particulate matter can provide an exposure pathway to residents of the City of Pelham. The closest residence to the Site is located within 300 feet of the process area. Forty (40) households are located within 100 yards of the Site. The central business district of Pelham is located within one half mile of the Site. The citizens may be affected by contaminated windborne fallout, depending on the prevailing wind direction. Surface water runoff in the past has channeled erosion paths across the Site in several areas.

Any prolonged delay in the response will result in continued releases, of hazardous substances into the environment, threatening the area's residents and the shallow groundwater.

The Site is inadequately fenced and provides no significant means for the prevention of unauthorized access.

A fence has been installed across the southern border of the Site, near the residential areas, to prevent unauthorized access, but there is evidence that trespassers have recently been on the property.

2. Continued Response Actions Required to Prevent an Emergency

The proposed vault will be designed as an on-site, above grade, RCRA-type vault with a RCRA-type cap. The on-site vault will be designed to accommodate the existing solidified/stabilized material, and to comply with applicable requirements for a RCRA-type vault.

The proposed location and layout of the on-site vault and associated facilities consist of the following elements: perimeter ditch constructed around the vault, a compacted clayey soil base at the bottom of the vault, a leachate collection and removal system(existing), a top cover system consisting of a composite liner, a protective soil cover, a topsoil soil layer and a vegetative cover, a perimeter drainage ditch along the toe of the outside slope of the top cap, a storm retention area located northwest of the vault, and a perimeter road surrounding portions of the vault and the storm water retention area. This action will eliminate the contaminant migration problem and the direct exposure threats associated with this area.

3. Assistance Will Not Otherwise Be Provided on a Timely Basis

Neither the State of Georgia nor the local government has the financial or contractual resources necessary to conduct the removal activities required to mitigate the threats present at the Site. Also, no viable PRP has been identified to conduct the removal activities necessary to mitigate the hazards present at this Site. The former owner/operator of the facility filed for bankruptcy in March, 1992, leaving a legacy of four CERCLA sites in Region 4.

## VI. PROPOSED ACTIONS AND ESTIMATED COSTS

### A. Proposed Actions

The Ceiling Increase is necessary to fund the following activities at the Site. Because of the cost associated with the removal and disposal of the contaminated sludges, stabilization and/or solidification and capping were selected.

To permanently remove the threats associated with this Site and complete this removal action, the following action is proposed: A cap will be placed over the contaminated soil to prevent migration of contaminants and eliminate the direct contact hazard present. The cap prevents or minimizes the infiltration of rainwater into the waste area, thus reducing continued leaching and transport of contaminants in the soil. This cap will be accompanied by a surface water diversion system that will also prevent lateral groundwater infiltration through the contaminated area.

#### B. Contribution to Remedial Performance

The proposed removal activity is designed to eliminate the threats of exposure and release at the Site and will provide the abatement necessary to protect public health, welfare, and the environment. The Site is not expected to obtain a score sufficiently high enough to make the NPL. Therefore, no subsequent remedial activity is likely to take place at the Site.

#### C. Description of Alternative Technologies

The alternative technologies that have been considered for the Site were different types of solidification. The following synopsis details the major considerations for each alternative.

##### Solidification/Stabilization:

Due to the nature and amount of hazardous substances that were processed at the Site, off-site disposal of the material is prohibitively expensive or simply not possible due to statutory or legal constraints. To eliminate the threat of exposure to the hazardous materials without immediate disposal, the wastes need to be securely contained at the Site.

Solidification/Stabilization reduces the hazardous potential of contaminated soils by converting the contaminants into their least soluble, mobile, or toxic forms, thus minimizing their potential for migration. The solidification of the soils and sludges provide the most effective non-destructive treatment technique available for long term stabilization. A treatability study was performed on the sludge to determine the proper solidification mixture.

The most suitable for general applications was the Type I Portland cement (common construction cement). Type II Portland cement will frequently be substituted for waste materials with moderate concentrations of sulfates (150-1,500 mg/kg).

A mix that is sulfate resistant and contains low quantities of alumina is generally used when waste materials contain concentrations of sulfates greater than 1,500 mg/kg (commonly known as Type V Portland cement).

Sodium silicate and other forms of soluble silicates have been used successfully as additives for encapsulation of wastes within the Portland cement matrix. Some formulations employing soluble silicates claim only a 5-10% increase in overall waste volume. Solubilities of heavy metal salts also seem to be greatly reduced when treated with soluble silicates in combination with Portland cement.

The high pH of the cement holds heavy metals in the waste as insoluble hydroxides or carbonates. The strength and the permeability of the solid material can be controlled by varying the composition of the cement. Materials such as organics, silt, clay, or coal may lengthen the setting and curing time of Portland cement mixtures by several days. Salts of copper, lead, tin, and zinc, and sodium salts of arsenate, borate, phosphate, and sulfide also retard the solidification of Portland cement. Finally, consideration should be given to the environment where the solidified waste will be land filled.

#### Long-Term Site Stabilization and Encapsulation

Where the OSC is faced with a Site that poses an immediate threat to the public or the environment, but where the large amount of hazardous material present precludes removal or disposal, response options to contain the wastes on Site and prevent migration are appropriate. Removal approaches in this category follow:

##### D. Applicable or Relevant and Appropriate Requirements (ARARs)

The response action at the Stoller Chemical Company Site - Pelham involves the consolidating and solidifying of soils and sludges within the area of containment (AOC). Thus, since placement will not occur, the LDRs are not legally applicable requirements for this response action.

RCRA closure requirements are not applicable because there will be no movement outside the AOC and thus no land disposal. However, RCRA closure requirements are relevant and appropriate to the consolidation of hazardous waste within the AOC. As noted on page 10 the solidified soil and sludge will be capped with an earthen cover, consistent with 40 CFR 264.228. Given the urgency of the planned response and its limited scope of containing and stabilizing the contamination, it is not practicable to attain the groundwater monitoring and post-closure care requirements of 40 CFR 264.228 for surface impoundments.

VI. Proposed Actions and Estimated Cost

Work initiated under this Action Memorandum should be completed within eighteen months from the approval date barring any unforeseen delays or occurrences.



A. Estimated Costs

Extramural Costs:	<u>Current Ceiling</u>	<u>Proposed Increase</u>	<u>Proposed Ceiling</u>
Regional Allowance ERCS	\$7,200,000	\$1,800,000	\$9,000,000
Non-Regional Allowance START	290,000	60,000	350,000
ERT/REAC	100,000	0	100,000
STRIKE TEAM	0	10,000	10,000
Subtotal	\$7,590,000	\$1,870,000	\$9,460,000
Contingency	<u>\$1,080,000</u>	<u>0</u>	<u>\$1,080,000</u>
Total Extramural	\$8,670,000	\$1,870,000	\$10,540,000
Intramural Cost:			
Direct	60,000	30,000	90,000
Indirect	108,000	43,200	151,200
Total, Intramural	<u>\$168,000</u>	<u>\$73,200</u>	<u>\$241,200</u>
TOTAL SITE BUDGET	\$8,838,000	\$1,943,200	10,781,200

## VII. EXPECTED CHANGE IN THE SITUATION SHOULD ACTION BE DELAYED OR NOT TAKEN

If removal activity is significantly delayed or not taken, then the migration of low pH runoff and contaminated soil migration will continue. The resulting release will spread highly contaminated soil into the environment, thereby increasing the risk to the public health, welfare, and the environment.

## VIII. OUTSTANDING POLICY ISSUES

There are no policy issues associated with this site.

## IX. ENFORCEMENT

The Site is held by a Bankruptcy Trustee out of Houston, TX. DOJ has been working to have the case dismissed. At this time there appears to be no liable and viable PRPs that may undertake response actions. The Stoller Chemical-Company-Pelham facility, as well as four other Stoller sites located in Region 4, were abandoned by the owner/operator through bankruptcy.

## X. RECOMMENDATION

This decision document represents the proposed removal action for the Stoller Chemical Company-Pelham located in Pelham, Mitchell County, Georgia; developed in accordance with CERCLA as amended, and consistent with the NCP.

Conditions at the Site meet the NCP section 300.415(b)(2) criteria for a removal action and the CERCLA 104(c) criteria for exemption from the \$2 Million Statutory limit and a emergency waiver criteria. Also, the 300.415 (b)(5)(i) criteria for an exemption to the statutory time and dollar limits. I recommend your approval of the Ceiling Increase for \$1,943,200 for the continuation of the removal activities. The total project ceiling if approved will be \$10,781,200. Authority to approve emergency exemptions above \$6 Million is with the AA/OSWER. The additional estimated \$1,800,000 required for this proposed action will come from the Regional removal allowance.

Approval: \_\_\_\_\_ Date: \_\_\_\_\_

Disapproval: \_\_\_\_\_ Date: \_\_\_\_\_

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Date: \_\_\_\_\_



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